

BEFORE THE
POSTAL REGULATORY COMMISSION
WASHINGTON, DC 20268-0001

DSCF Standard Mail Load Leveling

Docket No. N2014-1

PUBLIC REPRESENTATIVE
FIRST INTERROGATORIES AND REQUESTS FOR PRODUCTION OF
DOCUMENTS TO UNITED STATES POSTAL SERVICE WITNESS ANDERSON
(PR/USPS-T2-1-4)

(January 3, 2014)

Pursuant to Rules 25 through 28 of the Postal Regulatory Commission Rules of Practice, the Public Representative hereby submits the following interrogatories and requests for production of documents. Definitions and instructions included with the Public Representative's interrogatories PR/USPS-T1-1-10 dated January 3, 2014, are hereby incorporated by reference.

Respectfully Submitted,

/s/ Anne J. Siarnacki

Anne J. Siarnacki
Public Representative for
Docket No. N2014-1

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PR/USPS-T2- 1

On pages 1-2 of your testimony, you describe the postal demographics of the South Jersey District.

- a. How do these demographics make the results of the South Jersey Operations Test representative of the likely effects of a nationwide implementation of load level planning?
- b. In what ways do the postal demographics of the South Jersey District fail to be representative of the nation as a whole?

PR/USPS-T2- 2

On page 4 of your testimony, you discuss the reduction in overtime hours and carriers out past 1700 on Mondays in Ocean City during the South Jersey Operations Test, as compared to the previous week.

- a. How do mail delivery volumes in the South Jersey District's tourist communities, like Ocean City, generally change in the weeks that follow Labor Day weekend each year?
- b. Please provide a comparison of carrier overtime hours and carriers out past 1700 on Mondays during the South Jersey Operations Test and during the dates September 12, 2012 and September 27, 2012.
- c. Please provide USPS-LR-N2014-1/2 DOIS data by day of the week from August 1, 2012 to September 30, 2012, in the same format as File "SJ F2 Results.xls" tab "Data". Please provide this data disaggregated by route.

PR/USPS-T2-3

On pages 6 of your testimony, you stated that "[c]ertain locations indicated that the increase in Tuesday Standard Mail volume resulted in increased Tuesday workload" and explained that "Postal Service management in the South Jersey District will evaluate the qualitative information received about Tuesday workload with the quantitative data to ensure balanced delivery loads."

- a. Please identify, describe, and provide all documents detailing the qualitative information received about Tuesday workloads during the South Jersey Operations Test.
- b. Please identify, describe, and provide all documents detailing the quantitative data concerning Tuesday workloads during the South Jersey Operations Test.

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- c. Has Postal Service management in the South Jersey District evaluated the qualitative information received about Tuesday workloads with the quantitative data from the South Jersey Operations Test?
- d. If your response to part (c) is in the affirmative, please identify, describe, and provide all documents related to that evaluation.
- e. If your response to part (c) is in the negative, when does the Postal Service management in the South Jersey District expect to conduct the evaluation of the qualitative and quantitative information concerning Tuesday workloads during the South Jersey Operations Test?

PR/USPS-T2-4

On page 7 of your testimony, you state “[i]f implemented, the proposed Load Leveling Plan would result in increased productivity and cost savings throughout the South Jersey District.”

- a. Please identify, describe, and provide all documents detailing the Postal Service’s projected productivity gains and costs savings for the South Jersey District if the proposed Load Leveling Plan is implemented.
- b. Please identify, describe, and provide all documents detailing the productivity gains and cost savings that occurred in the South Jersey District during the South Jersey Operations Test.